

Case assigned to Judge D-17

Mary Thonker House

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Precision Development, LLC;  
Castle Asset Management, LLC

**ORIGINAL**  
LOS ANGELES SUPERIOR COURT

JAN 25 2008

JOHN A. CLARKE, CLERK  
BY MARY GARCIA, DEPUTY

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

PRECISION DEVELOPMENT, LLC, a  
Nevada Limited Liability Company;  
CASTLE ASSET MANAGEMENT, LLC, a  
Delaware Limited Liability Company,

Plaintiffs,

v.

YURI PLYAM, an individual; NATASHA  
PLYAM aka NATALIA PLYAM, an  
individual; MIKHAIL PLYAM, an  
individual; DOES 1 through 50, inclusive,

Defendants.

CASE NO. **BC384285**

**VERIFIED COMPLAINT**

For:

1. Unfair Business Practices
2. Conversion
3. Constructive Trust
4. Breach of Fiduciary Duty
5. Breach of Contract
6. Specific Performance
7. Conspiracy

By this Verified Complaint, Plaintiffs PRECISION DEVELOPMENT, LLC and CASTLE ASSET MANAGEMENT, LLC, allege as follows against YURI PLYAM, an individual; NATASHA PLYAM aka NATALIA PLYAM, an individual; MIKHAIL PLYAM, an individual; and DOES 1 through 50, inclusive:

**GENERAL ALLEGATIONS**

1. Plaintiff PRECISION DEVELOPMENT, LLC, a Nevada Limited Liability Company ("PRECISION") is qualified to do business in California and does

CIT/CASE: BC384285 LEA/DEF#:  
RECEIPT #: CCH47307805  
DATE PAID: 01/25/08 08:40 AM  
PAYMENT: \$320.00  
RECEIVED:  
CHECK:  
CASH:  
CHARGE:  
DATE: 01/25/08 08:40 AM  
0310

1 business in Los Angeles County.

2           2.     Plaintiff CASTLE ASSET MANAGEMENT, LLC, a Delaware  
3 Limited Liability Company ("CASTLE") does business in Los Angeles County. Its  
4 application for qualification to do business is pending with the California Secretary of  
5 State; the application will be filed and all fees paid.

6           3.     Defendants YURI PLYAM, an individual, NATASHA PLYAM aka  
7 NATALIA PLYAM, an individual, and MIKHAIL PLYAM, an individual reside in Los  
8 Angeles County.

9           4.     Plaintiffs do not know the identities of DOES 1 through 50,  
10 inclusive but will amend the Complaint to add them once their identities are known.  
11 Plaintiffs are informed and believe that such DOES are agents for and act on behalf of  
12 each of the Defendants.

13           5.     Venue is proper in Los Angeles County because each of the wrongs  
14 alleged below were committed in such County.

15                               **FIRST CAUSE OF ACTION**

16                               **UNFAIR BUSINESS PRACTICES**

17                               **AGAINST ALL DEFENDANTS**

18           6.     Plaintiffs incorporate by reference paragraphs 1 through 5 as if fully  
19 set forth hereat.

20           7.     MIKHAIL PLYAM ("Mikhail") is a general contractor. His son is  
21 YURI PLYAM ("Yuri"), a registered (and possibly barred by the Commodities Trading  
22 Commission) commodities trader. NATASHA PLYAM aka NATALIA PLYAM  
23 ("Natalia") is Yuri's wife and helps manage Yuri's non-commodities business pursuits.

24           8.     Frank Parlato is the attorney-in-fact for New York residents Clare  
25 and Sara Bronfrom, who are sisters.

26           9.     Yuri was the Bronfrom sisters' commodities broker.

27           10.    Yuri and the Bronfrom sisters developed a relationship where Yuri  
28 asked the Bronfrom sisters to fund a real estate development project in Los Angeles

1 County. The Bronfrom sisters were told that Yuri and Natalia needed \$22 million to fund  
2 initial property acquisitions in upscale areas in Los Angeles County (principally, west  
3 Los Angeles and Studio City), as well as to fund the acquisition of plans, permits and to  
4 install initial foundation work to bring the properties to the point where construction  
5 loans would be obtainable. Yuri was not to contribute any money to the venture, but  
6 would be the developer, along with his father Mikhail as the general contractor. The  
7 business venture involved the development of single family residences as well as one  
8 condominium project.

9 11. The Plyams and the Bronfroms created two business entities to  
10 manage and own the investment. PRECISION would own the acquired properties.  
11 CASTLE would be the developer. The Bronfroms, along with, a business partner, Nancy  
12 Salzman, would own and control two-thirds of PRECISION and CASTLE.

13 12. From April 13, 2005 to December 20, 2007, the Bronfroms wired  
14 \$26,310,000 to a PRECISION Bank of America account controlled by Yuri.

15 13. Using these funds, Yuri acquired and may have partially developed  
16 the following properties in the name of PRECISION:

- 17 (1) 4147 Libbit Ave, Encino, CA 91436 APN 2284-001-016
- 18 (2) 13361 and 13349 Newcomb Ave, Sherman Oaks, CA 91423 APN  
19 2386-030-001; 2386-030-004
- 20 (3) 8209 and 8195 Lauremont, Los Angeles 90046 APN 5565-018-045;  
21 5565-018-046; 5565-018-047; 5565-108-048
- 22 (4) 3769 and 3761 Avenida del Sol, Studio City, CA 91604 APN 2384-  
23 015-044; 2384-015-045; 2384-015-046
- 24 (5) 22568 and 22574 W. Uhea Rd, Woodland Hills, CA 91364 APN  
25 2076-015-031; 2076-015-032; 2076-016-028; 2076-015-033
- 26 (6) 4260 and 4180 Natomia Ave, Woodland Hills, CA 91364 APN 2174-  
27 008-043; 2174-008-044
- 28 (7) 3800 Oakfield, Sherman Oaks, CA 91423 APN 2274-016-016
- (8) 1700 Viewmont, Los Angeles, CA 90069 APN 5558-015-015
- (9) 9812 Wanda Park, Beverly Hills, CA 90210 APN 4383-001-034

- 1 (10) 8517 W. Franklin, Los Angeles, CA 90069 APN 5558-025-014  
2 (11) 4220 N. Gentry, Studio City, CA 91604 APN 2368-016-034  
3 (12) 4001 Sumac Dr., Sherman Oaks, CA 91403 APN 2275-008-001  
4 (13) 2526 Benedict Cyn, Beverly Hills, CA 90210 APN 4382-008-014  
5 (14) 5898 Lorae, Los Angeles, CA 90068 APN 5580-017-005  
6 (15) 12212, 12218 and 12226 Laurel Terrace, Studio City, CA 91604  
7 APN 2376-006-009; 2376-006-010; 2376-006-011  
8 (16) 39920 Knobhill, Sherman Oaks, CA 91423; APN 2274-004-029  
9 (17) Vacant lots on Avenida del Sol, Studio City, CA; APN 2384-015-  
10 021, APN 2384-015-022  
11 (18) Vacant lot on Meadow Bay Drive, Lake Arrowhead, CA 92352,  
12 APN 0333-052-19  
13 (19) Property in Beverly Hills, California, APN 4382-001-34; 4382-001-  
14 35.

15 14. Using the Bronforns' wired funds, Yuri also acquired the following:

- 16 (20) 17707 Alonzo, Encino, CA 91316 APN 2182-025-022 (held  
17 in the name of Yuri Plyam)  
18 (21) 9810 Wanda Park, Beverly Hills, CA 90210 APN 4383-001-  
19 035 (held in the name of Precision Development, LLC, but which  
20 Yuri claims he owns)  
21 (22) 22560 Uhea Rd, Woodland Hills, CA 91364 APN 2076-016-  
22 027 (held in the name of Yuri)  
23 (23) 607 North Roxbury Drive, Beverly Hills, California 90120,  
24 APN 4345-006-004 (held in the name of Natalia)  
25 (24) 3750 Alta Mesa Drive, Los Angeles, CA, APN 2384-015-014  
26 (held in the name of Takahashi Hiroko).

27 15. Rather than develop PRECISION-acquired property as the parties  
28 intended, Yuri diverted labor and materials owned by PRECISION or CASTLE to  
develop properties 20 through 24 above.

16. Plaintiffs are also informed and believe that assets and funds of  
PRECISION and CASTLE have been diverted into other business entities controlled by  
the Plyams, including possible entities which bear name similarity to CASTLE.

1           17. Property No. 23, the "Roxbury Property," has been represented to  
2 the plaintiffs to be the future personal residence of Yuri and Natalia. It is a palatial  
3 structure, partially constructed, with the costliest components.

4           18. On information and belief, the Roxbury Property has been acquired  
5 and constructed with the funds and assets of PRECISION and CASTLE, which assets  
6 should have been used instead to pursue the objectives of PRECISION and CASTLE.

7           19. Frank Parlato, the attorney-in-fact for the Bronforns, confronted  
8 Yuri in January 2008 over the diversion of funds and assets. Yuri admitted to the  
9 diversion. On January 8, 2008, Yuri and Natalia agreed to surrender control of  
10 PRECISION and CASTLE to Mr. Parlato, whom they agreed to appoint as President of  
11 both entities. In addition, they agreed to transfer to PRECISION Property Nos. 20, 21  
12 and 22 (see above).

13           20. Plaintiffs are also informed and believe that the Plyams directed  
14 vendors to inflate bills so that the Plyams would receive a kickback. On information and  
15 belief, the Plyams directed Hubbard Doors to inflate a \$9,000 bill to \$30,000.

16           21. A former CASTLE employee responsible for costing and estimating  
17 jobs was instructed by the Plyams to fraudulently inflate cost estimates.

18           22. The Plaintiffs are also informed and believe that CASTLE, while  
19 under the control of the Plyams, inflated payroll costs.

20           23. Yuri Plyam also failed to obtain qualification to conduct business in  
21 California for Castle Asset Management, LLC.

22           24. Further, Mikhail resigned as general contractor on January 15, 2008.  
23 However, at the time of his resignation, Mikhail threatened in retaliation to withdraw  
24 existing permits necessary to complete the works of improvement of PRECISION  
25 property.

26           25. As Mr. Parlato attempted to assume control of the PRECISION  
27 properties, he and his agents were threatened with arrest by the agents of the Plyams.  
28 Mikhail and his agents were observed during the week of January 24, 2008 breaking into

1 storage lockers and removing tools and equipment belonging to PRECISION and  
2 CASTLE, as well as hauling away at least one skiploader.

3 26. Plaintiffs have suffered injury in fact and has lost money and  
4 property as a result of the unfair business practices.

5 27. The actions of Yuri, Natalia and Mikhail constitute unlawful, unfair  
6 and fraudulent business practices within the meaning of Section 17200 of the Business &  
7 Professions Code. They have conspired to convert corporate assets and funds for their  
8 personal benefit. They have usurped corporate opportunity.

9 28. Plaintiffs are entitled to an injunction and restitutionary  
10 disgorgement.

11 **SECOND CAUSE OF ACTION**

12 **CONVERSION**

13 **AGAINST ALL DEFENDANTS**

14 29. Plaintiffs incorporate by reference paragraphs 1 through 27 as if  
15 fully set forth hereat.

16 30. Defendants, and each of them, have converted funds and assets of  
17 the plaintiffs. Such funds and assets include LLC funds, equipment and rolling stock.

18 31. In addition, Defendants have converted the books and records of  
19 PRECISION and CASTLE.

20 32. Plaintiffs have demanded a return of such funds, assets, books and  
21 records but defendants have not complied.

22 33. Plaintiffs are entitled to an order restoring converted funds and  
23 assets, and books and records, as well as a constructive trust imposed upon the assets of  
24 said Defendants.

25 34. The conversion was malicious, with an intent to hurt and injure  
26 plaintiffs. Defendants, and each of them, knowingly engaged in acts of theft and  
27 deception for their own personal aggrandizement. Plaintiffs are entitled to punitive  
28 damages.

1 **THIRD CAUSE OF ACTION**

2 **CONSTRUCTIVE TRUST**

3 **AGAINST ALL DEFENDANTS**

4 35. Plaintiffs incorporate by reference paragraphs 1 through 31 as if  
5 fully set forth hereat.

6 36. Defendants, and each of them, have used the funds and assets of  
7 PRECISION and CASTLE to acquire, build and improve the personal residence of Yuri  
8 and Natalia.

9 37. On information and belief, Defendants and each of them have  
10 diverted funds and assets of PRECISION and CASTLE into investment vehicles or  
11 entitles not under the control of PRECISION and CASTLE.

12 38. Defendants, and each of them, and their assets, should be subject to a  
13 constructive trust because said Defendants hold property wrongfully and have been  
14 unjustly enriched thereby.

15 39. In particular, Plaintiffs request that a constructive trust be placed  
16 upon the real property identified above as Nos. 20 through 24.

17 **FOURTH CAUSE OF ACTION**

18 **BREACH OF FIDUCIARY DUTY**

19 **AGAINST YURI AND NATALIA PLYAM**

20 40. Plaintiffs incorporate by reference paragraphs 1 through 38 as if  
21 fully set forth hereat.

22 41. While in control of PRECISION and CASTLE, Yuri and Natalia  
23 owed a fiduciary duty to the LLCs to usurp no opportunity and to exert proper care for  
24 the funds, assets and books and records. They did not.

25 42. Not only did Yuri and Natalia not exert proper care, they misused  
26 the funds, assets, books and records for their own personal aggrandizement. They did so  
27 maliciously, with an intent to specifically hurt and injure Plaintiffs. Defendants, and each  
28 of them, knowingly engaged in acts of theft and deception for their own personal

1 aggrandizement.

2 43. Plaintiffs are entitled to compensatory damages and restitution.

3 44. Plaintiffs are entitled to punitive damages.

4 **FIFTH CAUSE OF ACTION**

5 **BREACH OF CONTRACT**

6 **AGAINST YURI AND NATALIA PLYAM**

7 45. Plaintiffs incorporate by reference paragraphs 1 through 43 as if  
8 fully set forth hereat.

9 46. On January 6, 2008, by written agreement, Yuri and Natalia Plyam  
10 agreed to convey to PRECISION Property Nos. 20, 21 and 22. They have not.

11 47. PRECISION is entitled to an award of damages to compensate for  
12 the value of the property not conveyed.

13 **SIXTH CAUSE OF ACTION**

14 **SPECIFIC PERFORMANCE**

15 **AGAINST YURI AND NATALIA PLYAM**

16 48. Plaintiffs incorporate by reference paragraphs 1 through 46 as if  
17 fully set forth hereat.

18 49. An order of specific performance is necessary to compel such  
19 conveyance.

20 **SEVENTH CAUSE OF ACTION**

21 **CONSPIRACY**

22 **AGAINST ALL DEFENDANTS**

23 50. Plaintiffs incorporate by reference paragraphs 1 through 48 as if  
24 fully set forth hereat.

25 51. Each of the Defendants conspired with each other to commit the  
26 torts described in the Second and Fourth Causes of Action.

27 52. Each of the Defendants is liable for the remedy to be imposed for the  
28 Second and Fourth Causes of Action.



1 WHEREFORE, PLAINTIFFS PRAY AS FOLLOWS:

2 A. That, with respect to the First Cause of Action, appropriate  
3 injunctive relief issue which prohibits the Defendants' interference with the funds, assets,  
4 and books and records of the Plaintiffs.

5 B. That, with respect to the First Cause of Action, the Defendants be  
6 ordered to make restitutionary disgorgement of funds and assets misappropriated from  
7 the Plaintiffs.

8 C. That, with respect to the Second, Third and Seventh Causes of  
9 Action, that a constructive trust be imposed upon the assets of the Defendants and,  
10 specifically, upon 607 North Roxbury, Beverly Hills, California

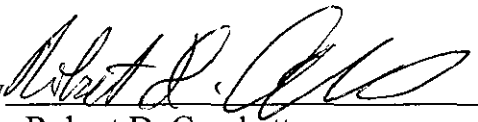
11 D. That, with respect to the Second, Fourth and Seventh Causes of  
12 Action, the Defendants pay compensatory and restitutionary damages, as well as punitive  
13 damages.

14 E. That, with respect to the Sixth Cause of Action, Yuri and Natalia  
15 Plyam pay damages for the failure to convey property.

16 F. That, with respect to the Fifth Cause of Action, Yuri and Natalia  
17 Plyam should be compelled to transfer, or cause to be transferred, (20) 17707 Alonzo,  
18 Encino, CA 91316 APN 2182-025-022 (held in the name of Yuri Plyam); (21) 9810  
19 Wanda Park, Beverly Hills, CA 90210 APN 4383-001-035 (held in the name of Precision  
20 Development, LLC, but which Yuri claims he owns); (22) 22560 Uhea Rd, Woodland  
21 Hills, CA 91364 APN 2076-016-027 (held in the name of Yuri Plyam).

22  
23 Dated: January 24, 2008

LATHAM & WATKINS  
Robert D. Crockett

24  
25 By   
26 Robert D. Crockett  
27 Attorneys for Plaintiffs  
28 Precision Development, LLC and  
Castle Asset Management, LLC

## VERIFICATION

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Robert D. Crockett (Bar No. 105628) James Wald (Bar No. 229108) LATHAM & WATKINS, LLP 633 West Fifth Street, Suite 4000 Los Angeles, California 90071-2007 TELEPHONE NO.: (213) 485-1234 FAX NO.: (213) 891-8763 ATTORNEY FOR (Name): PRECISION DEVELOPMENT, LLC, ET AL.		FOR COURT USE ONLY <b>FILED</b> LOS ANGELES SUPERIOR COURT  JAN 25 2008  JOHN A. CLARKE, CLERK BY MARY GARCIA, DEPUTY	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, 90012 BRANCH NAME: CENTRAL DISTRICT		CASE NAME: Precision Development, LLC, et al. vs. Yuriplyam, et al.	
<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> <b>Unlimited</b> (Amount demanded exceeds \$25,000) <input type="checkbox"/> <b>Limited</b> (Amount demanded is \$25,000 or less)		<b>Complex Case Designation</b> <input type="checkbox"/> <b>Counter</b> <input type="checkbox"/> <b>Joinder</b> Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	
		CASE NUMBER: 8C384285 JUDGE: DEPT:	

Items 1-5 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

<b>Auto Tort</b> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) <b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) <b>Non-PI/PD/WD (Other) Tort</b> <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) <b>Employment</b> <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<b>Contract</b> <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) <b>Real Property</b> <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input checked="" type="checkbox"/> Other real property (26) <b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <b>Judicial Review</b> <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	<b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</b> <input checked="" type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) <b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20) <b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) <b>Miscellaneous Civil Petition</b> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- |  |  |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> Substantial postjudgment judicial supervision  |
3. Type of remedies sought (check all that apply):  
 a. ☒ monetary     b. ☒ nonmonetary; declaratory or injunctive relief     c. ☒ punitive
4. Number of causes of action (specify):
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date:

1/24/08

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

**NOTICE**

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

SHORT TITLE:

Precision Development, LLC, et al. vs. Yuriplyam, et. al.

CASE NUMBER

BC384285

**CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION  
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

**This form is required pursuant to LASC Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.**

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? ☒ YES CLASS ACTION? ☐ YES LIMITED CASE? ☐ YES TIME ESTIMATED FOR TRIAL 10 ☐ HOURS/ ☒ DAYS

Item II. Select the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

**Step 1:** After first completing the Civil Case Cover Sheet Form, find the main civil case cover sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

**Step 2:** Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

**Step 3:** In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked.  
For any exception to the court location, see Los Angeles Superior Court Local Rule 2.0.

**Applicable Reasons for Choosing Courthouse Location (see Column C below)**

- |   |  |
|---|--|
| 1. Class Actions must be filed in the County Courthouse, Central District.      | 6. Location of property or permanently garaged vehicle.    |
| 2. May be filed in Central (Other county, or no Bodily Injury/Property Damage). | 7. Location where petitioner resides.                      |
| 3. Location where cause of action arose.  | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred.                      | 9. Location where one or more of the parties reside.       |
| 5. Location where performance required or defendant resides.                    | 10. Location of Labor Commissioner Office.                 |

**Step 4:** Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
<b>Auto Tort</b>	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
<b>Other Personal Injury/Property Damage/Wrongful Death Tort</b>	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4. 1., 2., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 2., 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 2., 4.
<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death		1., 2., 3. 1., 2., 4.	
<b>Non-Personal Injury/Property Damage/Wrongful Death Tort</b>	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 3.
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.

Non-Personal Injury/Property Damage/  
Wrongful Death Tort (Cont'd.)

Employment

Contract

Real Property

Judicial Review Unlawful Detainer

SHORT TITLE: Precision Development, LLC, et al. vs. Yuriplyam, et. al.		CASE NUMBER
A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons -See Step 3 Above
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels_____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
Unlawful Detainer- Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.

SHORT TITLE: Precision Development, LLC, et al. vs. Yuriplyam, et. al.	CASE NUMBER
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Judicial Review (Cont'd.)

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Antitrust/Trade Regulation (03)	<input checked="" type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
Construction Defect (10)	<input type="checkbox"/> A6007 Construction defect	1., 2., 3.
Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
Partnership Corporation Governance(21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

SHORT TITLE: Precision Development, LLC, et al. vs. Yuripliyam, et. al.	CASE NUMBER
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE		ADDRESS:	
<input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		19 different places - LA and Beverly Hills	
CITY:	STATE:	ZIP CODE:	
Los Angeles	CA	90071	

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Moyle courthouse in the Central District of the Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subds. (b), (c) and (d)).

Dated: 1/24/08

[Signature]  
(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:
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1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LACIV 109 (Rev. 01/07), LASC Approved 03-04.
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form FL-935, if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

FILED IN COURT